

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE  
PLAYERS' CONCUSSION INJURY  
LITIGATION

MDL No. 2323

Case No. 2:12-md-2323-AB

Kevin Turner and Shawn Wooden,  
*on behalf of themselves and others  
similarly situated,*

Hon. Anita B. Brody

Civil Action No. 14-00029-AB

Plaintiffs,

vs.

National Football League and NFL  
Properties, LLC, successor-in-interest  
to NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:

ALL ACTIONS

**NOTICE OF JOINDER IN MOTION BY THE LOCKS LAW FIRM FOR  
APPOINTMENT OF ADMINISTRATIVE CLASS COUNSEL**

FrancoLaw, PLLC and Hodgins Law Group, LLC represent over fifty (50) former NFL players and their families in the above-captioned matter. Undersigned counsel on behalf of its clients hereby join in the Motion by the Locks Law Firm for Appointment of Administrative Class Counsel and for a Hearing [ECF No. 9786], for the reasons stated therein and in its Memorandum in Support.

Our experience in the Claims Process shows that the terms of the Settlement Agreement are not being faithfully applied, similar to that described in the Locks Firm Memorandum at

pages 6-7 (identifying 14 failures). These newly-created barriers have caused unnecessary and inappropriate delays in the review of Class Members' claims and are often applied in a way that prejudices Class Members and benefits the NFL. Numerous law firms have filed motions highlighting the administrative burdens and processing issues with the claims review process and the class will be best served having an administrative counsel actively dealing with pending claims now and in the future.

Undersigned counsel respectfully requests that the Court appoint Administrative Class Counsel and hold a hearing on implementation failures to correct, among other things, failures identified in the Locks Law Firm Memorandum.

Dated: March 28, 2018

Respectfully submitted,

s/ David B. Franco

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 28, 2018, I caused the foregoing document to be filed with the Clerk of Court of the United States District Court for the Eastern District of Pennsylvania via the Court's CM/ECF system, which will provide electronic notice to all parties and counsel of record.

*s/ David B. Franco*

David B. Franco